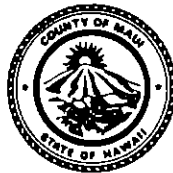


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Mayor



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November 19, 2009

The Honorable Chairman and Members of the
Hawaii Public Utilities Commission
465 South King Street, Room 103
Kekuanaoa Building
Honolulu, Hawaii 96813

PUBLIC UTILITIES
COMMISSION

2009 NOV 23 A 8:51

FILED

Re: Docket No. 2009-0108: Framework for Integrated
Resource Planning - Comments on the NRRI Paper on
Clean Energy Scenario Planning

Dear Chairman Caliboso and Members of the Commission:

Pursuant to the Order Approving the Stipulated Procedural Order, As Modified, the Counties of Hawaii, Kauai, and Maui ("Counties") offer the following comments on the paper by the National Regulatory Research Institute ("NRRI"), titled, "Clean Energy Scenario Planning: Thoughts on Creating a Framework."

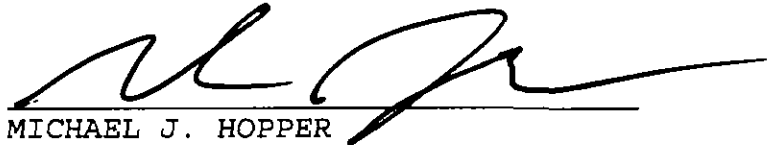
1. Generally, the Counties of Hawaii, Kauai, and Maui (Counties) find that Hawaii's current Integrated Resource Planning ("IRP") framework falls somewhere between NRRI's description of the Clean Energy Scenario Planning ("CESP") process and the conventional IRP process. The flexibility of Hawaii's IRP Framework has allowed the HECO utilities to move toward a more robust scenario planning approach through the development and analysis of diverse resource portfolios and through the use of a parallel, draft sustainability strategy. Like NRRI's CESP, Hawaii's IRP Framework should enable "decisionmakers to make resource or policy decisions that provide good results under a wide range of scenarios," although one could argue that implementation has fallen short.
2. The Counties support the general use of scenario planning because it expands upon the current treatment of

uncertainties and because it explicitly broadens the IRP Framework to address plausible eventualities.

3. Per the NRRI paper, the Counties will address NRRI's questions on Appendix C in our Final Statement of Position.

If you have any questions, please do not hesitate to contact me.

Respectfully Submitted,



MICHAEL J. HOPPER
Deputy Corporation Counsel
County of Maui

WILLIAM V. BRILHANTE, JR.
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cc: Service List

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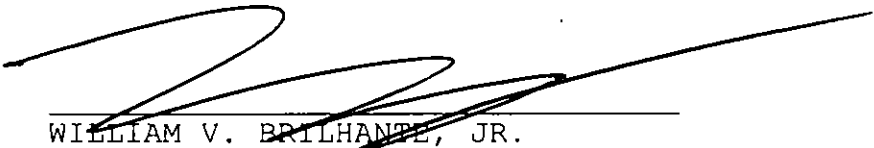
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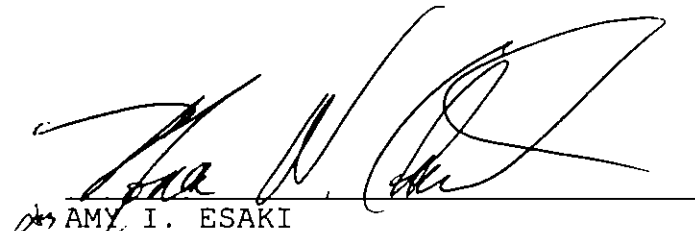
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